

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

UNITED STATES OF AMERICA	*	CRIMINAL NO. 24-cr-00115
	*	
VERSUS	*	
	*	
JAWORSKI BATTON	(02) *	JUDGE WALTER
CODY GIBSON	(04) *	
COREY RUSSELL	(10) *	MAGISTRATE JUDGE HORNSBY

**GOVERNMENT'S NOTICE PURSUANT TO RULE 16 (a)(1)(G): EXPERT
WITNESS**

NOW INTO COURT, through the undersigned Assistant United States Attorney, comes the United States, which respectfully gives notice pursuant to Rule 16 (a)(1)(G) and Federal Rules of Evidence 702, 703, and 705 regarding expert witnesses, as follows:

1.

Federal Rule of Evidence 702 provides that:

A witness who is qualified as an expert by knowledge, skill, experience, training, or education may testify in the form of an opinion or otherwise if:

- (a) the expert's scientific, technical, or other specialized knowledge will help the trier of fact to understand the evidence or to determine a fact in issue;
- (b) the testimony is based on sufficient facts or data;

- (c) the testimony is the product of reliable principles and methods; and
- (d) the expert has reliably applied the principles and methods to the facts of the case.

2.

The United States intends to call Paul Hursey, Special Agent of the Drug Enforcement Agency (“DEA”), as an expert witness in its case-in-chief, pursuant to Rule 702 of the Federal Rules of Evidence. Special Agent Hursey will testify as an expert in drug trafficking investigations, specifically in regard to the difference between distribution and personal use amounts of narcotics; and use and functions of firearms in drug trafficking, which include protection, self-defense, and a deterrent to potential threats, as well as the significance of the accessibility and position of firearms to serve functions of drug trafficking. He will also testify regarding the methods used by drug traffickers to conduct their trade and to conceal their trade from law enforcement, which includes the use of coded language. He will also testify that based on his experience in investigating drug trafficking, drug traffickers possess firearms to intimidate customers and potential competitors, and to protect their drug stash.

3.

Special Agent Hursey’s specialized knowledge will assist the jury in understanding the facts and significance of the evidence in this case, per Rule 702. Most jurors are not familiar with particulars of controlled dangerous substances including distribution weights. His testimony will be based on his specialized knowledge, experience, and training in firearms and narcotics trafficking investigations. Special

Agent Hursey's curriculum vitae, highlighting his experience in both firearms and narcotics investigations, will be provided to counsel's for defense.

4.

The Government will call Carmelo Gómez-Meléndez and Trina T. Do, as expert witnesses in its case-in-chief. Gómez-Meléndez and Do are both Senior Forensic Chemist at the DEA Southeast Laboratory and will testify regarding the identity and weight of the methamphetamine and other drugs seized in this case on several different dates during the investigations per the report previously provided to counsel. The United States will provide Adkins' and Shire's curriculum vitae to the defendants.

5.

The Government will call Brett Lee, a Special Agent employed by the Alcohol, Tobacco, and Firearms (ATF) agency in Shreveport, Louisiana, as an expert witness in its case in chief. He will testify regarding the results of his analysis of the firearms seized in this case, and the interstate nexus of the firearms per his report which has been provided to counsel. He will also testify as to the proper handling of firearms. The United States will provide Lee's curriculum vitae to the defendants.

6.

The Government will also call DeAndria Moss and Randall Robillard as expert witnesses in its case in chief. Moss and Robillard are forensic scientists at North Louisiana Criminalistics Laboratory in Shreveport, Louisiana and will testify regarding the methamphetamine and marijuana seized in this case on or about

November 28, 2023, per their reports previously provided to counsel. The United States will provide Moss and Robillard's curriculum vitae to the defendants.

7.

Accordingly, the Government gives notice that it intends to call these individuals as expert witnesses.

Respectfully submitted,

ALEXANDER VAN HOOK
Acting United States Attorney

/s/ J. Aaron Crawford

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